

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

IN RE:

JASON WAYNE THOMAS
KATIE RACHEL THOMAS

Debtors.

Case No. 18-50348-BTF

**TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM STAY
AND REQUEST FOR DISMISSAL OF MOTION**

COMES NOW the trustee herein, Bruce E. Strauss, who responds to the motion for relief from stay filed by Nationstar Mortgage LLC, on the property located at 436 South Chestnut Street, Olathe, Kansas 66061, and states as follows:

1. That the 341 meeting of creditors is scheduled for October 5, 2018 at 8:30AM in St. Joseph, Missouri.

2. That movant filed its motion for relief on August 30, 2018, prior to the scheduled meeting of creditors.

3. That the undersigned trustee has not had an opportunity to ascertain the fair market value of the real property as the meeting of creditors has not been held.

4. The current renter has expressed interest in purchasing the property which would be beneficial to the estate, and the trustee needs time to investigate the potential sale. Therefore, the trustee requests that the court deny the pending motion for relief until such time as the trustee has had an opportunity to investigate this matter.

WHEREFORE, Bruce E. Strauss, trustee, prays an order of this court denying the pending motion for relief at this time and for such further relief as the court deems just, or in the alternative, dismissal of the motion.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ Bruce E. Strauss
Bruce E. Strauss MO#26323
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(816) 221-8855
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting electronic notification on September 12, 2018.

/s/ Bruce E. Strauss
Bruce E. Strauss